

MORGAN & MORGAN  
COMPLEX LITIGATION GROUP

John A. Yanchunis (Admitted *Pro Hac Vice*)  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
Telephone: 813/223-5505  
jyanchunis@ForThePeople.com

ROBBINS GELLER RUDMAN  
& DOWD LLP

Stuart A. Davidson (Admitted *Pro Hac Vice*)  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: 561/750-3000  
sdavidson@rgrdlaw.com

CASEY GERRY SCHENK FRANCAVILLA  
BLATT & PENFIELD LLP

Gayle M. Blatt (122048)  
110 Laurel Street  
San Diego, CA 92101  
Telephone: 619/238-1811  
gmb@cglaw.com

TADLER LAW LLP

Ariana J. Tadler (Admitted *Pro Hac Vice*)  
One Pennsylvania Plaza, 36th Floor  
New York, NY 10119  
Telephone: 212/946-9300  
atatler@tadlerlaw.com

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

Karen Hanson Riebel (Admitted *Pro Hac Vice*)  
100 Washington Ave. South, Suite 2200  
Minneapolis, MN 55401  
Telephone: 612/339-6900  
khriebel@locklaw.com

ROBINSON CALCAGNIE, INC.

Daniel S. Robinson (244245)  
19 Corporate Plaza Dr.  
Newport Beach, CA 92660  
Telephone: 949/720-1288  
949/720-1292  
drobinson@robinsonfirm.com

*Attorneys for Plaintiffs and Settlement Class Counsel*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION**

IN RE: YAHOO! INC. CUSTOMER DATA )  
SECURITY BREACH LITIGATION )

No. 16-md-02752-LHK

**PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: April 2, 2020

Time: 1:30 p.m.

Courtroom: 8, 4th Floor

Judge: Hon. Lucy H. Koh

1 PLEASE TAKE NOTICE THAT Plaintiffs move the Court to grant Plaintiffs' Motion for  
2 Final Approval.

3 Plaintiffs respectfully request that the Court finally approve the Settlement and that the  
4 Court enter an Order that:

5 (1) Finally approves the Amended Settlement Agreement and Release (ECF No. 396-  
6 2);

7 (2) Finally certifies the following Settlement Class under Fed. R. Civ. P. 23(b)(2) and  
8 (b)(3):

9 All U.S. and Israel residents and small businesses with Yahoo  
10 accounts at any time during the period of January 1, 2012 through  
11 December 31, 2016, inclusive; provided, however, that the  
12 following are excluded from the Settlement Class: (i) Defendants,  
13 Defendants' officers, directors, legal representatives, successors,  
14 subsidiaries, and assigns; (iv) any judge, justice, or judicial officer  
15 presiding over this matter and the members of their immediate  
16 families and judicial staff; and (v) any individual who timely and  
validly opts-out from the Settlement Class.

17 (3) Finally appoints as Class Representatives: John Bell, Michelle Bouras, Jana  
18 Brabcova, Reid Bracken, Paul Dugas, Hashmatullah Essar, Hilary Gamache, Mali  
19 Granot, Kimberly Heines, Andrew J. Mortensen, Brian Neff, Jared Pastor, Brendan  
20 Quinn, Deana Ridolfo, Matthew Ridolfo, and Yaniv Rivlin;

21 (4) Finally appoints as Class Counsel:

22 a. Lead Class Counsel: John Yanchunis of Morgan & Morgan Complex  
23 Litigation Group;

24 b. Executive Class Counsel: Ariana Tadler of Milberg Tadler Phillips  
25 Grossman LLP, Stuart Davidson of Robins Geller Rudman & Dowd LLP,  
26 Gayle Blatt of Casey Gerry Schenk Francavilla Blatt & Penfield LLP, and  
27 Karen Hanson Riebel of Lockridge Grindal Nauen PLLP; and  
28

c. Additional Class Counsel: Daniel Robinson of Robinson Calcagnie, Inc

(5) Finally approves the Notice Program as implemented;

(6) Finally appoints Heffler as the Claims Administrator;

(7) Overrules all objections; and

(8) Grants further relief as the Court deems just and proper.

DATED: January 31, 2020

Respectfully submitted,

MORGAN & MORGAN  
COMPLEX LITIGATION GROUP  
John A. Yanchunis

/s/ John A. Yanchunis

John A. Yanchunis

201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
Telephone: 813/223-5505  
813/223-5402 (fax)

ROBBINS GELLER RUDMAN  
& DOWD LLP

Stuart A. Davidson (Admitted *Pro Hac Vice*)  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: 561/750-3000  
561/750-3364 (fax)  
sdavidson@rgrdlaw.com

CASEY GERRY SCHENK FRANCAVILLA  
BLATT & PENFIELD LLP

Gayle M. Blatt (122048)  
110 Laurel Street  
San Diego, CA 92101  
Telephone: 619/238-1811  
619/544-9232 (fax)

TADLER LAW LLP

Ariana J. Tadler (Admitted *Pro Hac Vice*)  
One Pennsylvania Plaza, 36th Floor  
New York, NY 10119  
Telephone: 212/946-9300  
atadler@tadlerlaw.com

1 LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
2 Karen Hanson Riebel (Admitted *Pro Hac Vice*)  
3 100 Washington Ave. South, Suite 2200  
4 Minneapolis, MN 55401  
5 Telephone: 612/339-6900  
6 612/339-0981 (fax)

7 ROBINSON CALCAGNIE, INC.  
8 Daniel S. Robinson (244245)  
9 19 Corporate Plaza Dr.  
10 Newport Beach, CA 92660  
11 Telephone: 949/720-1288  
12 949/720-1292  
13 drobinson@robinsonfirm.com

*Attorneys for Plaintiffs and Settlement Class  
Counsel*

14 CERTIFICATE OF SERVICE

15 I hereby certify that January 31, 2020, I authorized the electronic filing of the foregoing  
16 with the Clerk of the Court using the CM/ECF system which will send notification of such filing  
17 to the e-mail addresses denoted on the attached Electronic Mail Notice List.

18 I certify under penalty of perjury under the laws of the United States of America that the  
19 foregoing is true and correct. Executed January 31, 2020.

20 /s/ John A. Yanchunis  
21 John A. Yanchunis  
22 MORGAN & MORGAN COMPLEX  
23 LITIGATION GROUP  
24 201 N. Franklin Street,  
25 7th Floor Tampa, FL 33602  
26 Telephone: 813/223-5505  
27 813/223-5402 (fax)  
28